

BAKER DECLARATION

EXHIBIT V

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF JOHN
PATRICK GRIFFIN

I, John Patrick Griffin, declare the following:

- 1- I am over eighteen years of age. I have personal knowledge of and am competent to testify on the issues contained herein.
- 2- **My Responsibilities as Food Service Supervisor.** From November 2, 2009 until November 29, 2012, I worked as a Food Service Supervisor at the Northwest Detention Center ("NWDC") for The GEO Group, Inc. ("GEO").
- 3- As a Food Service Supervisor, I reported to the Food Service Manager, Bertha Henderson (also known as "Bert"). It was my job to manage the GEO cooks and, together with the GEO lieutenants assigned to the kitchen, the detainees who worked in the kitchen. Alongside the cooks and the detainee workers, I prepared the meals served to the detainees held at the NWDC. The NWDC kitchen served three meals a day, seven days a week, plus sack lunches and special diet meals. I worked on weekends, holidays, and covered for Bert whenever she was sick or on leave. My

DECLARATION OF JOHN PATRICK GRIFFIN

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1 normal schedule was 11:00am to 8:30pm, six days a week. On occasion, after getting
2 off at 8:30pm, I would sometimes have to go in at 3:00am the next day.

3 4- When I was the Food Service Supervisor, two cooks worked the breakfast shift in the
4 morning, two cooks worked the lunch shift in the afternoon, and two cooks worked the
5 dinner shift in the evening. If a cook was sick or on vacation, I did all of the cooking
6 while also managing the kitchen. Sometimes I was the only cook in the kitchen and
7 had to cook while managing more than twenty detainee workers. If Bert was gone, I
8 was also in charge of kitchen operations. It was a difficult to complete all of the jobs
9 as one person.

10 5- I was also responsible for ordering food. GEO determined what food would be served
11 to the detainees on a four-week cycle menu, and negotiated the contractual relationship
12 with vendors from where we ordered food.

13 6- As a Food Service Supervisor, GEO required me to make sure the food costs did not
14 exceed more than \$1 per meal and to complete a monthly budget report. So, I usually
15 ordered low-grade, but edible food from vendors in Texas such as soy Salisbury steak,
16 soy burger patties, soy taco meat, forty-pound blocks of pink chicken meat. When the
17 food was delivered, detainee workers and cooks, including myself, would put
18 approximately seven pallets of groceries away. This usually happened twice a week.

19 7- **Detainee Workers and Their Responsibilities.** For each of the three meal services,
20 GEO had between fifteen to thirty detainees assigned to work in the kitchen. Detainee
21 workers generally worked four-hour shifts, but sometimes longer if staffing levels
22 were low. Detainee workers performed a wide range of tasks necessary for the kitchen
23 to operate smoothly and for us to meet all the applicable standards and laws for food
24 production. Detainee worker tasks included: cleaning the kitchen, washing dishes,
25 detailing the ovens, prepping or cooking food as directed by the cooks,
26 dividing/plating/setting out meals, and delivering meals to the pods.

8- Specifically, a group of detainee workers would work with a cook in the back to prep for the next days' meals. Detainee workers would cut potatoes, chop cabbage, prep salads, and cut corn bread with a dough cutter tethered to the table.

9- Another group of detainee workers would operate the line during the meal service. Detainee workers were particularly critical to our operations "on the line." They plated out the meals with equal portions for each detainee, as well as placed the plates and other items on individual trays. Because of the large volume of food we prepared and served, at least twelve detainees at a time were needed and assigned to work "the line" and plate the meals. Additional detainees were also needed to deliver the meal trays to each pod.

10- In addition to the three meals, detainee workers also made sack lunches. GEO officers used the sack lunches to reward detainee workers who had done extra tasks, like buffing the floor or painting the walls. For example, twice a week detainees would stay past their working shift to help unload groceries delivered from vendors. As a reward, they would receive a sack lunch. I understood the sack lunches were to be given to detainee workers in addition to the standard \$1 payment per day that they received for their work. Detainee workers generally liked the sack lunches because, unlike the regular meal service, it contained fresh food, like an apple or carrots.

11- Requesting Detainee Workers. If there were not enough detainee workers for the kitchen to operate smoothly, I would have to ask the GEO officers to help plate and distribute the meals. On a regular basis, I would need more detainee workers because detainee workers often quit, bonded out, or were deported. If I was short on detainee workers, I would ask GEO's Classification Officer, Alisha Singleton, to assign more detainee workers to the kitchen. Ms. Singleton maintained a running list of detainee workers interested in working in the kitchen.

12- To work in the kitchen, detainee workers had to sign up through Ms. Singleton. After that, detainee workers were screened by medical services and tested for tuberculosis. If they passed, the detainee workers would show up at the kitchen at the beginning of the meal service ready to work. In general, it took about one or two days for the medical clearance to come through. And, a new group of detainee workers showed up at the kitchen once a week.

13- **Training of detainee workers.** When the detainee workers started, I explained to them the task that they would do that first shift. After the first shift was over, and the meals were delivered, I gave them a standard orientation packet, which was a multi-page document that explained all of the kitchen tasks, their required uniform, sanitation standards, proper food handling techniques, safety information, and their rate of pay. Since many of the detainee workers could not read or write, I also gave them an approximately twenty minute orientation regarding work in the kitchen.

14- **Pay rate.** Detainee workers were paid \$1 per day. However, when I first started, some detainee workers chose to work more than one shift per day in the kitchen. One detainee worker who had been there for years, for example, worked all three shifts. For those who worked multiple kitchen shifts, GEO paid them \$5 per day. Some time after that, GEO prohibited detainee workers from working more than one shift.

15- In addition to the \$1 or \$5 per day, detainee workers were allowed to eat any remaining leftover food at the end of their shift. GEO required all food to be eaten within 24 hours. So, if there was leftover food, detainee workers assigned to the kitchen or the laundry, which was located right next to the kitchen, were allowed to eat it.

16- **Supervision.** The work performed by the detainees in meal preparation, plating, and cleaning, was supervised by me and the GEO cooks. We were always present and responsible for making sure the detainee workers were performing their job tasks and

duties properly and in accordance with the training provided and the procedures we were required to follow.

17- The detainee workers, however, were also supervised by a GEO lieutenant assigned to the kitchen. The GEO lieutenant was present throughout the entirety of the meal service. For security reasons, detainee workers were patted down at the beginning and end of their shift. If I caught them stealing food or kitchen utensils, I wrote them up and reported it to the GEO lieutenant, who would review the write up and determine whether to suspend the detainee worker from the kitchen. Almost daily, a detainee worker would try to take food. Generally, that worker would be suspended from working for three days.

18- Detainee workers could also be written up for other infractions. For example, some were written up for not being in proper uniform. Detainee workers were required to wear a uniform in the kitchen. GEO provided uniforms in various sizes. They included white pants, white shirts, hair nets, masks, and rubber boots.

19- At least one detainee worker was written up while I was there for assaulting another detainee worker in the kitchen. One detainee worker was also suspended for attempting to send his wife, a fellow detainee, messages with her meal. Another detainee worker was fired for putting a soft shell tortilla on the grill because he could have started a fire.


20- **My termination.** I was terminated on November 29, 2012. One of the pods refused to eat the meal prepared while I was on duty. Though I notified the lieutenant, his response was not to negotiate with the detainees. I was fired because I did not also notify Bert or the warden.

21- Prior to working at GEO, I had never worked in corrections. I had trained at culinary school and had worked in restaurants for decades. Currently, I am the Culinary Director for Bridgeport Place Retirement Community and have worked there for nine

1 months. Prior to that, I worked for Cedar Ridge Retirement Community as a Food
2 Service Manager for five years.

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4 I certify under penalty of perjury that the above is true and accurate.

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6 Dated this 24 day of September 2018 in Tacoma, Washington.

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9 John Patrick Griffin

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DECLARATION OF JOHN PATRICK GRIFFIN

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The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF BRIAN
STRONG

I, Brian Strong, declare the following:

- 1- I am over eighteen years of age. I have personal knowledge of and am competent to testify on the issues contained herein.
- 2- **My Responsibilities as a "Correctional Officer."** From 2012 to 2015, I worked as a "Correctional Officer" at the Northwest Detention Center ("NWDC") for The GEO Group, Inc. ("GEO").
- 3- My first assignment with GEO was to oversee the detainees that lived in pod B1. I also supervised the detainees who worked in the pod.
- 4- Apart from each detainees' own responsibility to clean their own living area, GEO relied on detainee workers to clean the bathroom and showers, clean the common areas of the pods before and after every meal, and distribute the food trays for breakfast, lunch, and dinner. Since there were three meal shifts, the detainee workers responsible for food tray distribution worked three shifts every day.

DECLARATION OF BRIAN STRONG

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- 1 5- GEO provided the pod detainee workers who cleaned the showers, bathrooms, and
2 common areas with all the necessary cleaning products and equipment including gloves
3 to perform this job.
- 4 6- I was responsible for making sure the detainee workers complied with their work
5 schedule and performed satisfactorially . If detainees didn't show up to work on time,
6 or refused to work a specific day, I would have to write them up to the Sargeant or
7 Lieutenant in charge, and they would decide whether to fire them from the job. All of
8 the detainee workers were paid \$1/day for their work.
- 9 7- I was ocassionally assigned to replace GEO officers that were posted at the kitchen, or
10 to supervise night clean up at the kitchen. In those occasions, I supervised detainee
11 workers GEO hired to work in the kitchen. There were three meal shifts: breakfast, lunch
12 and dinner. Each shift started a few hours before the meal was served, and finished after
13 all the kitchen, trays and utensils were cleaned.
- 14 8- For this work, detainee workers were only paid \$1/day. Sometimes the kitchen detainee
15 workers would also get extra food for their work. If so, they had to eat it in the kitchen
16 before returning to their pod.
- 17 9- The detainee workers were responsible for plating the food onto trays, which were later
18 put into carts to be taken to the pods by other detainee workers. Detainee workers also
19 cleaned the kitchen, the utensils, and the trays.
- 20 10- GEO also hired detainee workers to work in the laundry. I would sometimes cover for
21 the officers that were assigned to supervise laundry detainee workers, when the laundry
22 officers were on their breaks. There were about 5 or 6 detainee workers who worked in
23 laundry.
- 24 11- Detainee workers assigned to the laundry worked long shifts, about 5 or 6 hours each
25 day. They had to work until all the laundry from the 1,200 detainees of the NWDC was
26 done. I remember detainee workers were worn out at the end of the day because this

1 work involved a lot of heavy lifting. I could tell they were tired every day after their
2 shift. For all this work, detainee workers were only paid \$1/day.

3 12- GEO also hired detainee workers to buff and wax the hallway floors of the NWDC. It
4 happened mostly outside of the living areas, usually at what we called the "Grey mile."
5 This is the highest traffic area of the NWDC, which started at the control area on the
6 entry way, to the secured side. This work had to be done in the middle of the night when
7 people weren't walking through the hallways. GEO officers would ask detainee workers
8 to do this work about once a week, usually when GEO was about to be audited. It took
9 detainee workers three or four hours a night, over multiple nights to finish this work.
10 GEO provided the detainee workers with the cleaning supplies, machines gloves and
11 masks needed to do this work. GEO Officers or other detainee workers that had been
12 doing the work for longer, provided training to the new detainee-workers. The detainee
13 workers first did the stripping, then the waxing, followed by the buffing of the floors. It
14 was heavy work and detainee workers were only paid \$1/a day for this work, along with
15 some extra food.

16 13- Another job performed by detainee workers was the painting of the walls of the NWDC.
17 GEO hired detainee workers to do this work on an ad-hoc basis and detainee workers
18 would usually be paid in food, like sandwiches, in addition to the \$1 dollar a day.
19 Painting the walls of the NWDC took detainees several hours to complete. It happened
20 outside of the living areas for the most part in the "Grey mile".

21 14- **Training detainee workers.** Generally, GEO officers were responsible for training the
22 detainee workers to do their jobs. In the pod, the officers would show the detainee
23 workers assigned to cleaning where the cleaning supplies were and provide access to
24 the utility closet, where the supplies were stored. In the kitchen, detainee workers were
25 trained by the GEO cooks and/or kitchen staff.
26

Dated this 20th day of March 2019, in University, Washington.
Place

WA00022559

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF SEAN
MCCREERY

I, Sean McCreery, declare the following:

- 1- I am over eighteen years of age. I have personal knowledge of and am competent to testify on the issues contained herein.
- 2- **My Responsibilities as Food Service Supervisor.** From December 2012 to October 2014, I worked as a Food Service Supervisor at the Northwest Detention Center ("NWDC") for The GEO Group, Inc. ("GEO").
- 3- My job was to supervise the GEO cooks that worked at the NWDC's kitchen, and to also work as a cook, preparing the meals for the NWDC detainees. Together with the GEO cooks and guards assigned to the kitchen, I supervised the work of detainee workers who helped us in the kitchen. My supervisor was Food Service Manager Bertha Henderson (also known as "Bert"). Ms. Henderson trained me for the position when I first started.

DECLARATION OF SEAN MCCREERY

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- 1 4- My schedule in the kitchen was from 11:30 am to about 9:00 pm, Saturdays through
2 Wednesdays. Ms. Henderson set the schedule. I worked with two other cooks and
3 detainee workers for the lunch and dinner shifts. There was another shift early in the
4 morning where two GEO cooks worked with detainee workers to prepare breakfast.
- 5 5- Besides managing the cooks and the detainee workers, I was responsible for doing the
6 kitchen inventory and taking care of the administrative paperwork to keep the kitchen
7 running. When Ms. Henderson was not working, I was also responsible for ordering
8 food to meet the needs of the pre-established meal plan. GEO established the meal plans.
9 Even though I thought the meals we served were low-quality, I could not suggest new
10 meals or recipes.
- 11 6- **Detainee Workers and Their Responsibilities.** GEO hired about twenty to thirty
12 detainee workers to work each meal shift: breakfast, lunch and dinner. They worked
13 about 6 hours each shift, seven days a week, unless the work required them to work
14 longer or they stayed longer in the kitchen to help clean up. Shifts were limited to a
15 maximum of 8 hours a day.
- 16 7- Detainee workers were in charge of a variety of tasks that made it possible for the
17 kitchen to operate and serve the growing detainee population. Detainee workers helped
18 prepare the food. For example, detainee workers cut cabbages and potatoes, prepared
19 salads, cut cakes, and sliced ham. They weren't allowed to use the oven, but they were
20 assigned to prepare pancakes and other foods on the grill.
- 21 8- Detainee workers assigned to kitchen duty were also in charge of serving, or plating, the
22 food on the assembly line. They placed the prepared foods, fruit, and drinks on
23 individual trays, and then stacked the trays on carts that were later taken to the pods by
24 other detainee workers.
- 25 9- Detainee workers also made sack lunches for those detainees who were not able to
26 regularly eat with the general detainee population. We also divided the tasks that the

1 detainee workers needed to accomplish to prepare the lunch boxes in an assembly-line
2 fashion, i.e. some would put the ham and cheese on the sandwich, some would include
3 the ketchup and mustard, others would wrap the sandwiches and place them in the box,
4 still others would put the fruit and juice in the box.

5 10- Detainee workers also cleaned the cooking utensils, washed the used trays, loaded and
6 unloaded the dishwashers. They also cleaned the kitchen floors and walls, and the
7 bathroom.

8 11- Detainee workers also helped unload inventory deliveries of food and supplies from
9 trucks, and move them inside the kitchen. Sometimes they would help me do the
10 inventory, i.e. writing down numbers or helping me keep track of goods.

11 12- Detainee workers received gloves, masks and hairnets from GEO in order to perform
12 their job.

13 13- The work at the kitchen was time-consuming and hard on the workers. For each shift,
14 we had to make meals, prepare the trays and/or lunchboxes, and have them delivered to
15 between 1,000 - 1,500 detainees. With only three GEO cooks each shift, detainee
16 workers were essential to feed the detainee residents and for the operation of the kitchen.

17 14- **Training detainee workers.** When a new detainee worker came to work at the kitchen,
18 I would assign them to work at the dish pit so they could learn how to wash dishes and
19 use the dishwashers. As they got more experience, I would assign detainee workers to
20 help the cooks prepare the food, make pancakes, and other duties. Detainee workers who
21 worked in the kitchen for a long time were known as "cook helpers" and would also
22 train newer detainee workers, showing them how to perform some of the tasks.

23 15- To be able to work at the kitchen, each detainee worker had to get medical clearance.
24 They were also given an orientation packet containing documents they would have to
25 complete and sign, including a form that said the work was voluntary. The packet
26 contained the rules and regulations for working in the kitchen. If the detainee worker

1 could not read English, another detainee worker would translate for them. We needed
2 the workers to start as soon as possible since there was so much work to do at the kitchen,
3 so on many occasions detainees would receive the package only after they concluded
4 their first day of work.

5 16- **Pay rate.** Detainee workers were paid \$1 per day. Even though the pay is low for such
6 hard work, detainee workers generally wanted to work in the kitchen so they could have
7 access to more food. We provided food for the detainee workers at every shift and they
8 could have as much of it as they wanted until it was gone.


9 17- **Supervision.** I was in charge of supervising the work the detainees did in the kitchen.
10 Initially, I would make sure all detainees were present each day to work. If someone
11 didn't want to come to work, I would usually ask them the reason for refusing to work
12 and remove them from the roster. Then, we would call the next person signed up on the
13 waitlist to work in the kitchen. There were usually enough people that wanted the
14 opportunity to work in the kitchen to staff it properly.

15 18- In addition, I supervised the detainee workers by assigning them tasks, and providing
16 directions on the tasks they had to do each day, and then by supervising and intervening,
17 when necessary, to make sure everyone was doing their work so that food would be
18 ready for each meal.

19 19- The GEO guards assigned to the kitchen also supervised the detainee workers. The GEO
20 guards patted down detainee workers at the beginning and end of each shift. If they were
21 caught stealing, or if they had to be disciplined for some other reason, I would report
22 them to Ms. Henderson or the GEO guard assigned to the kitchen. Either Ms. Henderson
23 or the GEO guards would decide what the discipline measure would be, if any.
24 Generally, if someone was caught stealing for a second time, they would be fired.
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Multilingual CONNECTIONS

I certify that the Declaration of Orlando Marquez - The Geo Group was translated into English by a translator and editor working for Multilingual Connections who are both competent and qualified to perform translation into this language. This document has not been translated for a family member, friend, or business associate. I believe, to the best of my knowledge and abilities, that the final target file is an accurate and complete translation of the original Spanish version.


Katherine Baumann
Team Lead
Multilingual Connections, LLC

8/10/18
Date



Multilingual Connections, LLC #255450

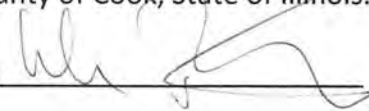


Subscribed and sworn to before me this

10 day of August, 2018, in

Evanston, County of Cook, State of Illinois.

Notary Public



The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF ORLANDO
ZAVALZA MARQUEZ

I, Orlando Zavalza Marquez, declare the following:

- 1- I am over eighteen years of age, I have personal knowledge of and am competent to testify on the issues contained herein.
- 2- I was detained by Immigration and Customs Enforcement (ICE) agents in April 2017 in Everett, Washington. Following the arrest, the ICE agents took me to the Northwest Detention Center, located in Tacoma, Washington. I continued to be detained there until December 1, 2017.
- 3- For the majority of the time I was detained in Tacoma, I worked in the NWDC's kitchen. The main reason I decided to sign up to work in the kitchen was because I heard that if you worked there, you could eat better, or at least more food.
- 4- If I was not working in the kitchen, I was hungry most days because the food at NWDC was not substantial, and was sometimes so unpleasant that I didn't eat anything, or I did not eat the majority of the food that NWDC would give us.

DECLARATION OF ORLANDO ZAVALZA
MARQUEZ

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1 5- In order not to be hungry, I had to buy food from the commissary, which was very
2 expensive. Calls abroad, video calls and watching movies on the electronic tablets
3 were also very expensive.

4 6- I did not receive economic assistance from anyone while I was detained, which is why
5 I needed to work to be able to pay for my calls and commissary expenses.

6 7- For these reasons, I decided to ask to work in the kitchen. I applied for the job with a
7 written message on the computer, and at some point in May of 2017 I was told that I
8 could begin working.

9 8- Before starting, I was asked to sign a paper that said that the work was voluntary. They
10 told me that if I didn't sign it, I wouldn't be able to work. I signed the document, I had
11 to work to be able to eat decently.

12 9- The detainees who worked in the kitchen typically worked seven days per week. I
13 asked to have Sundays off, which was approved.

14 10- There were three shifts of detainee workers in the kitchen. There were about 20
15 detainees assigned to each shift, and we worked five hours or more in each shift. The
16 first shift began in the morning, at 4 am, for breakfast. The second shift began at 10
17 am, for lunch. The third shift began at 4 pm, for dinner. I was assigned the dinner shift,
18 meaning I would usually work from 4 to 9 pm. Sometimes we had to work longer
19 hours if it was necessary. As compensation for extra time worked, we were given a
20 piece of bread or something similar.

21 11- In the kitchen, we had to do various tasks, including cleaning utensils, plates and
22 silverware, and even [cleaning] the kitchen and bathroom floors. We had to fill trays
23 with food for approximately 1,500 detainees, as well as for the security personnel or
24 visitors when we were requested to do so. Then we had to place these trays in carts,
25 sometimes lifting ten trays at a time to be able to complete the work, which was very
26 strenuous work. We also had to move very heavy pots with boiling water without help.

DECLARATION OF ORLANDO ZAVALZA
MARQUEZ

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On days when there were fewer employees in the kitchen, I had to fill two trays at a time with food, using both hands at the same time, which was very heavy and tiring.

12- For all this work, we were only paid \$1 per day of work.

13- The treatment I received in the kitchen from the people supervising the job was unpleasant. They were always yelling at me or rushing me, in spite of the fact that I was doing my best to complete the tasks I had. The work was often too much for the number of people who were working in the kitchen.

14- Because of the poor treatment we received in the kitchen, I requested that my job be changed. They assigned me to clean the bathrooms in the area where we lived.

15- This job was easier. It only took about twenty minutes per day and I was also paid \$1 per day of work. But since I could no longer take extra food in the kitchen, I started to go hungry again.

16- After a month and a half, I requested that they assign me to the kitchen again, so that I could eat better, but this time they did not approve my request to not work Sundays. During this period, I worked 5 hours per day, 7 days per week, without any day off, and I was only paid \$7 per week for my work.

17- There were other types of jobs available for detainees in the Detention Center. Some people were in charge of distributing the food trays to the rooms, and they did it three times per day. Other detainees were responsible for taking out the trash. Some were responsible for cleaning the tables in the rooms. I think that they paid \$1 per day for these jobs as well.

18- Sometimes they would offer us soda, food or chocolate for us to paint walls or buff the floors. I offered to paint walls on two occasions, but never to buff the floors, because that work was very tiring and lasted all night, from 11:30 pm to 5 am, approximately.

On one of the occasions when I painted the walls, they did not pay me for the extra work, since I had to go to the kitchen to work afterwards. Even though I did the extra

DECLARATION OF ORLANDO ZAVALZA
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1 work painting walls that day, which was not part of the kitchen work, they still paid
2 me only \$1 for the day of work, without soda, food or anything else.

3 19- Approximately a month and a half before I was released, I decided to quit the kitchen
4 work, because I did not like how I was treated and because the work was very
5 strenuous. After I resigned, and for about three days afterwards, the guards would call
6 me to clean the floors in the intake room, even though I had not requested that job. I
7 refused because I did not want to work anymore. I think that they called me because
8 they knew I was a good worker, and they wanted me to work. I worked very hard and I
9 did all of the tasks I was assigned well.

10 20- I think that it was very unfair for them to pay us \$1 per day of work. NWDC depended
11 on us, the detainees, to keep running. If it were not for our work, they would have had
12 to pay higher salaries to people from outside. For this reason, and because the work I
13 did was so strenuous and because I was treated badly, I felt exploited by the Detention
14 Center.

15 I certify under penalty of perjury that the above is true and accurate.

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17 Dated this 27th day of February of 2018 in Everett, Washington.

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ORLANDO ZAVALZA MARQUEZ



I certify that the declaration of Manuel Riveron Pina was translated into English by a translator and editor working for Multilingual Connections who are both competent and qualified to perform translation into this language. This document has not been translated for a family member, friend, or business associate. I believe, to the best of my knowledge and abilities, that the final target file is an accurate and complete translation of the original Spanish version.

Kara Davis
Team Lead

Date

Multilingual Connections, LLC



Multilingual Connections, LLC #255450

Subscribed and sworn to before me this

28 day of August, 2018, in

Evanston, County of Cook, State of Illinois.

Notary Public



The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION No.
3:17-cv-05806-RJB

DECLARATION OF
MANUEL RIVERON
PINA

I, Manuel Riveron Pina, state the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify on the matters contained herein.
- 2- I grew up in Cuba and lived there for most of my life. I made the difficult decision to leave Cuba because my life and freedom were in danger and it had become unsafe for me to stay.
- 3- I left Cuba in September 2016. I crossed the U.S. border in June 2017. I immediately gave myself up to authorities and requested asylum.
- 4- After first being detained in Texas, I was transferred to the Northwest Detention Center (NWDC) in Tacoma, Washington, where I was detained for approximately three months.

DECLARATION OF MANUEL RIVERON
PINA

1

ATTORNEY GENERAL OF WASHINGTON
Civil Rights Unit
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

WA00007583

- 1 5- When I got to the NWDC, GEO officers informed me that I could apply to
2 work in the kitchen or cleaning the dorms. I submitted a job application
3 through the kiosk that was available for us. Within fifteen days, GEO hired
4 me to work in the kitchen and made me sign documents to accept the
5 position. None of the documents were in Spanish, so I could not read the
6 documents on my own. Another detainee who spoke both English and
7 Spanish and who worked in the kitchen explained to me briefly what the
8 documents said.
- 9 6- My assignment to the kitchen was for the first shift, the breakfast shift, which
10 required me to work between six to eight hours per day, generally between
11 4:00 a.m. to 11:30 a.m., seven days a week. I worked consistently in the
12 kitchen, with a few gaps, throughout my time at NWDC. At the end of each
13 shift, we signed a work pay sheet indicating that we had worked. GEO paid
14 me \$1/day for my work, and did so by adding \$1 of credit to my commissary
15 account.
- 16 7- GEO provided me and the other kitchen workers with uniforms that we had
17 to use while we were working. The uniforms included a white top and
18 bottom, gloves, boots and a face/mouth mask.
- 19 8- We prepared breakfast and we also prepped some of the food for the other
20 meals. The security guards assigned the detainee workers to perform certain
21 tasks in the kitchen. I often prepared pancakes or hotcakes on the grill,
22 prepared rice, peeled potatoes, placed food, milk and packets of coffee on
23 trays, and placed the food trays on the cart for delivery to the residential
24 units/dorms. After the cooking was finished, I had to sweep and mop the
25 kitchen floors and cooking areas, as well as cleaning the trays and kitchen
26 utensils.

1 9- The kitchen was operated entirely by workers detained at the NWDC. At
2 least 20 of us were assigned to the breakfast shift, but we often were
3 understaffed when people were fired or deported. When we were
4 understaffed, the rest of us had to do the same strenuous work but with less
5 help. Furthermore, those shifts usually lasted longer.

6 10- There were three GEO guard supervisors on each shift in the kitchen. Their
7 main role was to oversee our work and ensure that people did not steal
8 anything from the kitchen. They monitored the detainee workers and ensured
9 that they complied with the schedule and worked until the work was
10 completed.

11 11- As a kitchen worker, I was required to work every day. Sometimes, the GEO
12 guard supervisors even required me to work when I was feeling ill or I was
13 not well enough to work.

14 12- When I asked for days off from kitchen shifts, they told me that I could not
15 get time off by simply asking them, but rather, I had to ask for time off many
16 days in advance.

17 13- Once, the number of detainees that were working in the kitchen was so low
18 that the GEO guards had to help cook the food. Although the GEO guards
19 did the hands-on work that day, it was not done on time, and it was not
20 sustainable. GEO completely depended on our work to feed the people
21 detained at the NWDC.

22 14- I chose to work for GEO to earn money to be able to call my family in Cuba.

23 15- I think that it is unfair that GEO paid those of us who were working at
24 NWDC just \$1/day to carry out essential functions that allowed the NWDC
25 to operate. I worked hard every day of the week and I received such a small
26 payment for my work, it was an insult. The low pay made it difficult for me

1 to keep in touch with my family, to buy necessary items or to save money for
2 when I would be released. If they had paid me a fair wage, I would have
3 been able to do all of these things.

4 I certify under penalty of perjury of the laws of the United States and the State of
5 Washington that the foregoing is true and accurate.

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7 Dated this 16th day of August of 2018 in Bremerton, Washington.
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12 MANUEL RIVERON PINA
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CERTIFICATE OF ACCURACY

I certify that the Declaration of Jesus Lopez Paez was translated into English by a translator and editor working for Multilingual Connections who are both competent and qualified to perform translation into this language. I attest that the final target file is an accurate and complete translation of the original Spanish version.

A handwritten signature in black ink, appearing to read "Kara Davis", is written over a horizontal line.

Kara Davis
Team Lead and Contract Manager
Multilingual Connections, LLC

9/20/18
Date



Multilingual Connections, LLC #255450

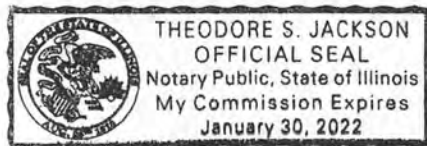
Subscribed and sworn to before me on

Thursday, September 20, 2018, in

Evanston, County of Cook, State of Illinois.

Notary Public

A handwritten signature in black ink, appearing to read "Theodore S. Jackson", is written over a horizontal line.



The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION No.
3:17-cv-05806-RJB

DECLARATION OF
JESUS LOPEZ PAEZ

I, Jesús López Páez, declare the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify on the issues contained herein.
- 2- I have been in the Northwest Detention Center (NWDC) since September 26, 2017.
- 3- I began working in the Voluntary Work Program in November 2017 and I have been working continuously since then in a variety of jobs.
- 4- I decided to work because I needed money to stay in touch with my family and make phone calls to my wife and children, as well as to buy things from the commissary. GEO calls the work program “voluntary”, but I really have no choice but to work for \$1/day because I need the money and there is no other way to earn it.

- 1 5- In the commissary, I buy food to eat, including noodles, chicken breast
2 and soft drinks. Sometimes I buy food in the commissary because I am
3 hungry. Other times, I buy food to have some variation in my diet.
- 4 6- When I first arrived at the NWDC, I was assigned to live in Pod C-2. I
5 became aware that I could get a job when a GEO guard asked me if I
6 wanted to work in the pod. I said "yes," and he placed me on the waitlist.
7 I was called to work when someone else quit their job, since I was the
8 next person on the list.
- 9 7- Before I was allowed to work, I was given a form that said something
10 about the fact that the work was voluntary and that I would be paid
11 \$1/day. I did not have time to read everything that was on the paper. I was
12 required to sign it, or initial it, before starting to work, and that is what I
13 did.
- 14 8- My first job was that of bathroom and shower cleaner. I did this job for a
15 couple of months. I did not receive training, but they told me to ask the
16 person who had been doing the work before me so that I would know
17 what to do.
- 18 9- There were 4-5 showers that I had to clean every day. Sometimes the
19 GEO guards also asked me to clean the bathrooms, including the 4 toilets.
20 Normally, cleaning the showers and cleaning the bathrooms are separate
21 tasks and two people would do the work each shift. When I did both jobs
22 in one day, I would work for more hours and I would still be paid only \$1
23 /day.
- 24 10- GEO gave us a spray bottle, buckets, bleach, gloves, mops and a rubber
25 squeegee.
26

1 11- There were three shifts for the bathroom and shower cleaners: the
2 morning shift at 11 a.m., the afternoon shift at [*handwritten: 4:20 p.m.*
3 *JLP*] and the night shift at 9:30 p.m. I was assigned to the 11:00 a.m.
4 shift. The work took about 30 to 40 minutes to complete. Every day, the
5 GEO officer on duty told me what to do and how to do it, which showers
6 needed more cleaning and if I had to clean the toilets as well.

7 12- On more than five occasions, I had to work all three shifts when no other
8 detainee wanted to do those jobs. I agreed to do it because I wanted us to
9 have clean bathrooms, and if I did not do it, no one else would. I was also
10 worried that I would lose my job if I said no. Even though I was working
11 three shifts, I still got paid only \$1/day.

12 13- I became tired of working double or triple shifts cleaning the showers and
13 bathrooms. I told the GEO guard that even though I did want to work, I
14 did not want to work multiple jobs anymore. The GEO guard on the
15 morning shift fired me from my position of shower cleaner and told me
16 that there was someone else willing to do the job if I didn't want to do it.

17 14- I told the guard assigned to the afternoon shift that I wanted to work and
18 that I needed to be assigned to another job. He told me that there was an
19 opening for a food server position, so I placed my name on the waitlist for
20 that job.

21 15- Before beginning work as a food server, I had to sign a Voluntary Work
22 Program agreement. I did not receive a job description with the position's
23 list of duties, although I know that descriptions of the work for each
24 position do exist.

25 16- I worked as a food server/food porter for approximately 4 months. I was
26 assigned to the position of Food Server # 2, and as such I had to clean the

1 tables before each meal, distribute the food trays to the detainees in the
 2 unit, and clean the tables and floors after each meal, three times per day. I
 3 had to wake up every morning at 5:30 or 6:00 a.m. to work on the
 4 morning shift. Food Server # 1 would go to the kitchen to collect the food
 5 trays and bring them to the unit. As Food Server # 2, I had to put the
 6 orange juice, tea and spoons on the trays and give them to the detainees.
 7 There were around 85 detainees in my unit that I had to serve. After they
 8 all finished eating, I had to clean the unit's tables and the floors. There
 9 were 10 long picnic benches and 2 round tables for 6 people that I cleaned
 10 during each meal, before and after the meal, as well as the floor area that
 11 got dirty during the meal. This position required me to work for about one
 12 hour three times per day for a total of three hours per day every day of the
 13 week.

14 17- After I had been working as a food server for quite some time, another
 15 detainee told me he thought I was doing additional work that was not
 16 necessary according to the job description of a food server, but I had no
 17 way of knowing that because I was not provided with a job description.

18 18- I quit my job as a food server after a GEO officer who was supervising
 19 me treated me poorly and I did not want to have any more contact with
 20 him.

21 19- I was transferred to Unit G3. Once I was there, I applied for work and
 22 was assigned to clean the visiting area. The GEO security guards who
 23 assigned me to this area gave me a tour of the area that I had to clean and
 24 told me what to do. They told me that I had to clean the hallways, the
 25 visiting areas and the bathrooms. I had to mop floors and pick up the trash
 26 of the visiting area. I had to do this work every night at 8:00 p.m.

1 20- GEO gave us mops, buckets, brooms, gloves and garbage bags to do this
2 work.

3 21- I did the job of cleaning the visiting areas for one and a half months. I
4 decided to stop doing this work because it interfered with my religious
5 activities. I am a leader in my unit's church and I lead religious services
6 at 3:00 p.m. and 8:00 p.m. every day. I changed my schedule cleaning the
7 visiting area to 7:00 p.m. so that I would be able to perform the religious
8 service at 8:00 p.m. But one night, the GEO guards made me work late,
9 so I missed the night service. That is why I decided to look for other job
10 opportunities.

11 22- While I was between work assignments, the GEO security guards asked
12 me if I was willing to wax and buff the floors of the visiting areas. I
13 accepted this job, which also paid \$1 per day. I asked them if they could
14 also give me a sandwich, but they told me they could not, that GEO was
15 no longer able to give food in exchange for this job. I waxed and buffed
16 the floors of the visiting area for 4 hours each day, for a total of four days.
17 *[text crossed out and initialed "JLP"]*

18 23- The job of waxing and buffing was very strenuous and tiring. GEO did
19 not provide us with masks and I felt very dizzy from inhaling the
20 chemicals from the products we had to use to remove the old wax before
21 applying the new wax.

22 24- In the past, I had waxed floors outside of the NWDC. I remember that I
23 was paid \$900 for 8 hours of work waxing and buffing floors in a yoga
24 studio. However, GEO only paid us \$1/ day for our work waxing and
25 buffing floors.
26

1 25- The next job I got was cleaning the floor on the dining area in my unit.
2 This work requires me to work every night after dinner, approximately
3 from 6:30 to 7:00 p.m. I do it once per day.

4 26- In the past, I also applied to work in the kitchen because I heard that you
5 could eat more and better food if you worked in the kitchen. The GEO
6 guards explained that they could not hire me to work in the kitchen
7 because last year I had knee surgery while I was detained at the NWDC
8 and I have not yet fully recovered.

9 27- We work hard at the NWDC every day to keep it clean and working. We
10 should be compensated fairly. \$1/ day is not a fair payment for what we
11 contribute to the operation of the NWDC.

12 I certify under penalty of perjury under the laws of the United States and the
13 State of Washington that the above is true and correct.

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15 Dated this 31st day of August of 2018 in Tacoma, Washington.
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18 JESUS LOPEZ PAEZ
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Certificate of Accuracy

I certify that **Noe Baltazar Noe's Declaration** was translated into **English** by translators and editors working for Multilingual Connections who are competent and qualified to perform translation into these languages. These documents have not been translated for a family member, friend, or business associate. I believe, to the best of my knowledge and abilities, that the attached materials are accurate and complete translations of the original **Spanish** version.

A handwritten signature in black ink, appearing to read "Nicholas Ferri".

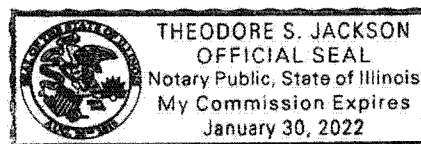
Nicholas Ferri

Multilingual Connections, LLC

Subscribed and sworn to before me this **12th** day of **June, 2019**, in Evanston, Cook County, State of Illinois.

A handwritten signature in black ink, appearing to read "Theodore S. Jackson".

Notary Public



Multilingual Connections, LLC #255450
PM: Nicholas - 283

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION No.
3:17-cv-05806-RJB

DECLARATION OF
NOE BALTAZAR NOE

I, Noe Baltazar Noe, declare the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify regarding the matters contained herein.
- 2- I have been detained in the Northwest Detention Center (NWDC) since February 2018.
- 3- I have been working in the Voluntary Work Program (VWP) for over one year. I want to be busy while being detained, and earn some money to be able to call my family and purchase food from the commissary, which is very expensive. I have held three jobs so far, all of them as a cleaner but in different areas of the NWDC.

DECLARATION OF NOE BALTAZAR NOE

1

OFFICE OF THE ATTORNEY GENERAL OF
WASHINGTON
Civil Rights Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

WA00029704

- 1 4- To apply for a job with the VWP, I signed up on one of the tablets that are
2 located in my housing unit. When there was a job opening, one of the
3 GEO officers let me know that I was hired and when I would start.
- 4 5- First, I worked as a cleaner assigned to cleaning the secured area's
5 hallways. I began work every day at 7:30 a.m. GEO paid me \$1 a day.
- 6 6- I worked in this position only for about 15 days. At that time of day it was
7 usually cold inside the NWDC. Since it was so cold and it only paid \$1 a
8 day, I decided to quit the job with the hope of getting another job with a
9 better schedule.
- 10 7- I applied again and was assigned to clean the intake area, which was not
11 as cold. The work consisted of cleaning the entire intake area and the
12 restrooms located in that area, mopping and sweeping, taking out the
13 garbage and placing new garbage bags in the garbage bins. I also had to
14 clean windows and doors. Some of the windows are very large and
15 cleaning them takes a long time. On average, I worked for two and a half
16 hours per day, seven days per week. Since the work was harder than I
17 expected, especially being paid only \$1 a day, I decided to quit and apply
18 for another position.
- 19 8- I applied for another job and was assigned to work as a cleaner in the
20 visitation area. I have been doing this work for about ten months. I work
21 seven days a week and they pay me \$1 a day.
- 22 9- As a cleaner in the visitation area, my job requires me to clean the entire
23 visitation area, mop the floors, take out the garbage, clean the windows
24 and tables, both in the visitation rooms as well as in the courtrooms
25 located within the NWDC. There are approximately fifteen rooms in the
26 family visitation area, five rooms in the attorney visitation area, five

1 courtrooms and two bathrooms located in the visitation area. I clean all of
2 them every day.

3 10- When I started the job, I received training from the GEO security officers
4 assigned to the visitation area. They trained me for the first couple of
5 days, showed me how to do the job, what I had to do and where to clean.
6 They supervise my work every day, provide me with the tools, supplies
7 and equipment I need to do the job such as spray cleaning products, paper
8 towels and garbage bags.

9 11- When I started this job and for about three months, I was the only
10 detainee-worker hired to do the work. During this time, it took me around
11 three and a half hours to finish the work every day. The GEO officers
12 who supervised my work noticed that, although I was doing my work
13 correctly, it took me over three hours each day to finish cleaning the area
14 assigned. They told me that because of this, they decided to hire two more
15 detainees so that they would work with me cleaning the visitation area.
16 One of them has been deported, so now there are two of us detainee-
17 workers assigned to clean the area, and it takes us approximately an hour
18 and a half every day to finish the job.

19 12- In general, we begin work at 7 pm and finish when all of the cleaning is
20 done.

21 13- The job of cleaning the visitation area also requires me to buff and wax
22 the floors of the area. This happens approximately once every three
23 months. The GEO security officers tell me when it is time to buff and
24 wax, and they provide me with a buffing machine and the waxing
25 products necessary for doing this job. On these days, I begin working
26 earlier than usual, around 5 pm, because this work requires more hours to

complete. Even though buffing and waxing requires us to work much longer than usual, between three and a half and four hours, they only pay us \$1 a day for doing the work.

14- The other jobs available at the NWDC are in the kitchen or at the laundry. I did not want to work at either of these jobs because they also pay only \$1 a day, but they require you to work around 5 hours or more each day. I believe that in the laundry, detainee-workers have to lift heavy bags and do the laundry of all of the detainees at the NWDC, which is hard work. In the kitchen, the detainees help cook, clean and plate food for the whole population of the NWDC. I am not willing to do such hard work for just \$1 a day.

15- I believe the work I do is fundamental to keep the NWDC clean and operating properly, and I deserve to be paid more than \$1 a day for the work that I do.

I certify under penalty of perjury under the laws of the United States and the State of Washington that the above is true and correct.

Dated this 21st day of May 2019 in Tacoma, Washington.

[Signature]

NOE BALTAZAR NOE

Multilingual CONNECTIONS

Certificate of Accuracy

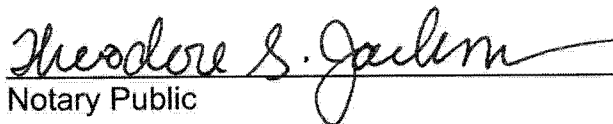
I certify that **Karla Gomez de Soto's Declaration** was translated into **English** by translators and editors working for Multilingual Connections who are competent and qualified to perform translation into these languages. These documents have not been translated for a family member, friend, or business associate. I believe, to the best of my knowledge and abilities, that the attached materials are accurate and complete translations of the original **Spanish** version.



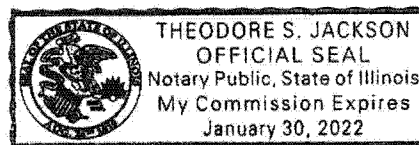
Nicholas Ferri

Multilingual Connections, LLC

Subscribed and sworn to before me this **13th** day of **June, 2019**, in Evanston, Cook County, State of Illinois.



Notary Public



Multilingual Connections, LLC #255450
PM: Nicholas - 285

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION No.
3:17-cv-05806-RJB

DECLARATION OF
KARLA GOMEZ
SOTO

I, Karla Gomez Soto, declare the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify on the issues contained herein.
- 2- I am currently detained in the Northwest Detention Center (NWDC), and have been detained for approximately one year. I have worked in the Voluntary Work Program for most of the time that I have been detained.
- 3- When I arrived to the NWDC and found out that I could work while I was detained, I decided to apply for a job. I wanted to earn some money to be able to call my family. I have two children, one fifteen-year-old and one seventeen-year-old, and I keep in touch with them as much as I can.
- 4- I was assigned to work folding laundry in my housing unit, D1. The work consists of folding all of the clean laundry for the facility, organizing the

DECLARATION OF KARLA GOMEZ SOTO

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OFFICE OF THE ATTORNEY GENERAL OF
WASHINGTON
Civil Rights Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

WA00029712

1 laundry by type and size, and placing the clothing in the correct container.
2 We have to fold and sort towels, bedsheets, blankets, underwear, shirts
3 and uniforms, and also organize them by sizes.

4 5- I have been doing this work non-stop, seven days a week, for about 11
5 months. I do this work with 13 other detainee-workers inside our pod.
6 We work in our rooms, on the floor or on the tables of the dining area.
7 The GEO officers bring laundry carts to our pod every day and they leave
8 them in the hall. After that, we pick them up and begin to work.

9 6- GEO pays me \$1 a day for this job. On some days, when there is leftover
10 fruit or milk in the kitchen, the GEO security officers give them to us as
11 additional compensation, but it is never enough for all of us, which is why
12 they generally raffle them off. I have never won anything from these
13 draws so far.

14 7- Our regular work schedule starts at 8 p.m. However, there are days when
15 we begin earlier, even two hours before our normal schedule, if there is
16 extra laundry to fold. We finish our shift when all of the clothing is folded
17 and organized, which generally keeps us working until around 9:30 p.m.

18 8- On certain days, GEO also requires us to work in the morning for
19 approximately one and a half hours folding towels and bedsheets. Over
20 the past three months, due to the growth in the NWDC population, we
21 have been working morning and night shifts almost every day. Even when
22 I work two shifts every day, I am still paid \$1 for a day of work.

23 9- In spite of us working more hours than what I thought we would be
24 working when I signed up for the job, I am still working because I need
25 the money to call my children. I miss them a lot, and they need me to be
26 in contact with them as much as I can. I also use part of the money I earn

1 to buy food in the commissary and, sometimes, to help other detainees
2 who need it more than I do.

3 10- The NWDC is able to operate thanks to the work that us, the detainee-
4 workers, perform every day to keep it running. I think that paying us just
5 \$1 a day is unfair and I think that we should be compensated according to
6 the work that we do.

7 I certify under penalty of perjury under the laws of the United States and
8 the State of Washington that the above is true and correct.

9
10 Dated this 3rd day of June 2019 in Tacoma, Washington.

11
12 [Signature]

13 KARLA GOMEZ SOTO
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CERTIFICATE OF ACCURACY

I certify that the Declaration of Judith Chavez Ortiz was translated into English by a translator and editor working for Multilingual Connections who are both competent and qualified to perform translation into this language. I attest that the final target file is an accurate and complete translation of the original Spanish version.

A handwritten signature in black ink, appearing to read "Kara Davis", is written over a horizontal line.

Kara Davis
Team Lead and Contract Manager
Multilingual Connections, LLC

9/20/18
Date



Multilingual Connections, LLC #255450

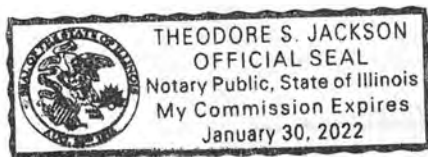
Subscribed and sworn to before me on

Thursday, September 20, 2018, in

Evanston, County of Cook, State of Illinois.

Notary Public

A handwritten signature in black ink, appearing to read "Theodore S. Jackson", is written over a horizontal line.



The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff

v.

THE GEO GROUP, INC.,

Defendant

CIVIL ACTION No.
3:17-cv-05806-RJB

DECLARATION OF
JUDITH CHAVEZ
ORTIZ

I, Judith Chávez Ortiz, declare the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify on the issues contained herein.
- 2- In July 2018, I worked in the Voluntary Work Program run by GEO in the Northwest Detention Center (NWDC) for three weeks. My job, along with other women workers from my unit, was to do the laundry for the NWDC. They assigned us to fold the clean clothing (underwear, shirts, pants, socks), sheets and blankets. We also sorted these items into groups based on their size, placed them into bags, labeled the bags and placed the bags on carts to be delivered to the other units. This work was carried out in our unit, the D2 women's unit, in the common area where we would usually eat.

- 1 3- The clothing, sheets and blankets are washed and dried by men in the
2 laundry room. Once they finish washing and drying, they send the
3 clothing, sheets and blankets to the women's unit responsible for folding
4 and sorting them. Once the women finish folding and sorting them, the
5 men pick up the carts of clothing and take them to the units.
- 6 4- Some of the items of clothing we had to fold were dirty, stained or foul-
7 smelling, even after they had been washed. Part of our work was to
8 discard items that were too repulsive to continue using them or to
9 distribute them to the detainees.
- 10 5- This job required me to work every day without a day off. Depending on
11 the amount of clothing in the laundry that day, I had to work once or
12 twice per day. On average, I worked 2-3 hours per day. The GEO guards
13 would tell us if we had to work once or twice per day and when we had to
14 work.
- 15 6- Before I was allowed to work, I had to sign a form that was written in
16 English. I cannot read English, so I don't know what the form said. I also
17 had to sign a form at the end of each workday.
- 18 7- GEO only paid me \$1 per day for this job. In spite of the very low pay, I
19 decided to work while I was detained at NWDC because I needed the
20 money to be able to talk to my family. Since I have been detained, my
21 20year-old daughter has been working very hard to take care of my 15
22 and 10year old children. I cannot ask my daughter for money to make
23 phone calls, since she is already dealing with so much at home.
- 24 8- I am not currently working at the laundry because the GEO guards
25 decided to assign the laundry work to another women's unit in the
26 NWDC. I applied to get a new job in the Voluntary Work Program and I

1 have been waiting for many weeks. I have been told that there are no jobs
2 available at this time. I am on a waitlist.

3 9- I miss my children very much and I would like to call them every day.
4 However, I do not have money to pay for my phone calls, and I cannot
5 earn it because I do not have a job in the Voluntary Work Program and I
6 cannot earn money any other way while I am being detained in the
7 NWDC. Now, I can only call my children when another detainee
8 generously gives me the money from their phone calls.

9 10- I think that it is unfair that GEO pays each of their detainee workers \$1
10 per day for the work they perform in the Voluntary Work Program. The
11 detainees do all the laundry in the NWDC, clean the NWDC and prepare
12 all the detainees' food. GEO depends on us, the detainees, to keep the
13 NWDC running. They should pay us what our work is worth.

14 I certify under penalty of perjury under the laws of the United States and the
15 State of Washington that the above is true and correct.

16
17 Dated this 31st day of August of 2018 in Tacoma, Washington.
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20 JUDITH CHAVEZ ORTIZ
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